

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 21-cr-108 (PAM/TNL)

UNITED STATES OF AMERICA,)
)
Plaintiff,)
vs.)
)
DEREK MICHAEL CHAUVIN,)
)
Defendant.)
)
)

DEFENDANT’S PRETRIAL MOTION FOR GOVERNMENT AGENTS TO RETAIN ROUGH NOTES

Derek Michael Chauvin, through his undersigned attorney, Eric J. Nelson, Halberg Criminal Defense, moves the Court, pursuant to 18 U.S.C. §3500 for an order requiring any law enforcement officer to preserve and retain for inspection for defense all rough notes and video/audio tapes gathered as part of the investigation in the above-captioned case in accordance with *Brady v. Maryland*, 375 U.S. 83 (1963); *United States v. Gaston*, 608 F.2d 607 (5th Cir. 1979); *United States v. Bernard*, 607 F.2d 1257 (9th Cir. 1979); 18 U.S.C. §3500(e)(1); and Rule 16 of the Federal Rules of Criminal Procedure.

This motion is based upon the files and records in this case, the Indictment, the Federal Statutes, the Federal Rules of Criminal Procedure, the United States and Minnesota Constitutions and upon such other and further points and authorities as may subsequently be presented to the Court.

Respectfully submitted,

HALBERG CRIMINAL DEFENSE

Dated: August 3, 2021

/s/ Eric J. Nelson

Eric J. Nelson

Attorney No. 308808

Attorney for Defendant

7900 Xerxes Avenue South, Suite 1700

Bloomington, MN 55431

Phone: (612) 333-3673